



KAMEHAMEHA SCHOOLS®

April 8, 2022

VIA U.S. MAIL AND E-MAIL

Jelani Shareem, Enforcement Officer (via U.S. Mail and E-Mail)
U.S. Environmental Protection Agency
Region IX – Enforcement Division
75 Hawthorne Street (ENF-3-3)
San Francisco, CA 94105

Kimberly Wells, Attorney Advisor (via U.S. Mail and E-Mail)
U.S. Environmental Protection Agency
Region IX – Office of Regional Counsel
75 Hawthorne Street (ORC-2-3)
San Francisco, CA 94105

Re: In the Matter of: Kamehameha Schools
EPA Docket No.: UIC-009-2018-0008
Phase I (O‘ahu) Large Capacity Cesspool (“LCC”) Closures and Schedule

Dear Mr. Shareem and Ms. Wells:

I am Director of Asset Management of Community & ‘Āina Resiliency of the Trustees of the Estate of Bernice Pauahi Bishop d/b/a Kamehameha Schools (“KS”).

Pursuant to Paragraph 48.a of the Consent Agreement and Final Order in the Matter of: Kamehameha Schools, EPA Docket No: UIC-009-2018-0008 (“CA/FO”) and the Environmental Protection Agency’s (“EPA”) January 6, 2022 letter granting KS’s request for an extension, below please find KS’s plan and schedule for closure of the nineteen (19) LCCs identified in Phase I (O‘ahu) of this audit:¹

¹ The Auditor’s Inspection Phase Completion Report for Phase I (O‘ahu) was previously submitted to the EPA on April 7, 2022, pursuant to Paragraph 47 of the CA/FO and the EPA’s January 6, 2022 letter granting KS’s request for an extension.

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
1	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	KS in discussions with tenant.	KS in discussions with tenant.
2			Final LCC Closure Report dated July 8, 2019 was submitted to EPA by Auditor	Final LCC Closure Report dated July 8, 2019 was submitted to EPA by Auditor.
3			Final LCC Closure Report dated November 27, 2019 was submitted to EPA by Auditor.	Final LCC Closure Report dated November 27, 2019 was submitted to EPA by Auditor.
4			LCC to be abandoned, back-filled and closed by Tenant.	<p>Tenant's engineer has prepared plans.</p> <p>Application for IWS permit to be submitted to HDOH.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
5	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	<p>KS to close LCC.</p> <p>KS' engineer inspected property to establish existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH on or before May 6, 2022.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>
6			<p>KS to close LCC.</p> <p>KS' engineer inspected property to establish existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH on or before May 6, 2022.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
7	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	Tenant to close LCC and replace with 1000 gallon Septic Tank manufactured by Orenco Systems, Inc.	<p>Application for IWS permit to be submitted to HDOH on or before May 6, 2022.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>
8			Final LCC Closure Report dated May 17, 2019 was submitted to EPA by Auditor.	Final LCC Closure Report dated May 17, 2019 was submitted to EPA by Auditor.
9			<p>KS to close LCC.</p> <p>KS' engineer inspected property to establish existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH on or before May 6, 2022.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
10	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	KS to close LCC. KS' engineer to inspect property for existing design conditions and restrictions.	Application for IWS permit to be submitted to HDOH as soon after plans are prepared. Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO). LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).
11			KS in discussions with tenant.	KS in discussions with tenant.
12			Tenant to close LCC. Tenant has retained engineer to prepare septic plans.	Application for IWS permit to be submitted to HDOH as soon after plans are prepared. Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO). LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).
13			KS in discussions with tenant.	KS in discussions with tenant.

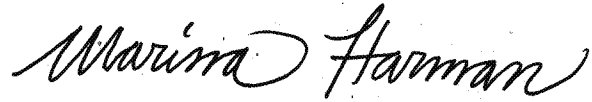
No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
14	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	<p>KS to close LCC.</p> <p>KS' engineer to inspect property for existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH as soon after plans are prepared.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>
15			<p>KS to close LCC.</p> <p>KS' engineer to inspect property for existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH as soon after plans are prepared.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
16	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	Tenant to close LCC and retain engineer and contractor for closure.	<p>Application for IWS permit to be submitted to HDOH as soon after plans are prepared.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>
17			Tenant to close LCC. and retain engineer and contractor for closure.	<p>Application for IWS permit to be submitted to HDOH as soon after plans are prepared.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
18	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	<p>KS to close LCC.</p> <p>KS' engineer to inspect property for existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH as soon after plans are prepared.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>
19			<p>KS to close LCC.</p> <p>KS' engineer to inspect property for existing design conditions and restrictions.</p>	<p>Application for IWS permit to be submitted to HDOH as soon after plans are prepared.</p> <p>Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).</p> <p>LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).</p>

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Very truly yours,

A handwritten signature in black ink that reads "Marissa Harman". The signature is fluid and cursive, with the first name "Marissa" and the last name "Harman" clearly distinguishable.

Marissa Harman
Director, Asset Management
Community & 'Āina Resiliency Group
Trustees of the Estate of Bernice Pauahi Bishop
d/b/a Kamehameha Schools